

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

Willie Clay,)	
)	
Plaintiff,)	No. 19-cv-2412
)	
-vs-)	Judge Wood
)	
Thomas Dart and Cook County,)	
)	
)	
Defendants.)	

PLAINTIFF'S REQUEST TO PRODUCE DATED FEBRUARY 16, 2021

Plaintiff Willie Clay, by counsel, and pursuant to Rule 34 of the Federal Rules of Civil Procedure, hereby requests that defendants Dart and Cook County produce documents and electronically stored information described below at the offices of plaintiff's counsel.

1. For the period January 1, 2016 to the present, all Business Case Reports submitted by the Department of Oral Health pertaining to any dental clinic at Cermak Health Services.

2. From January 1, 2016 to January 1, 2019, all e-mails and attachments maintained in Dr. Jorelle Alexander's account responsive to the following terms:

- a. "DOJ";
- b. "HSRF analysis";

- c. “action plan” and “Cermak”;
- d. “action plan”;
- e. “process improvement” and “Cermak”;
- f. “process improvement”;
- g. “self” and “assessment”;
- h. “Monitoring Team”;
- i. “quality of care” and “grievance”;
- j. “access to care” and “grievance”;
- k. “manual log”;
- l. “evening” and “clinic” and “Cermak”;
- m. “Saturday” and “clinic” and “Cermak”; or
- n. “emerg” and “oral”

When responding to this request, please also produce the electronic information identifying the number of “hits” in response to each search term.

3. From January 1, 2016 to the present, all e-mails (including attachments) between Dr. Jorelle Alexander and John Cervone. This request includes the electronic information identifying the number of “hits.”

4. If the above identified request is too burdensome, please produce from January 1, 2016 to the present, all e-mail (including attachments) between Dr. Alexander and John Cervone responsive to the following search terms:

- a. “x-ray”;
- b. “xray”;

- c. "DOJ";
- d. "vacuum";
- e. "chair"; or
- f. "compress"

When responding to this request, please also produce the electronic information identifying the number of "hits" in response to each search term.

5. From January 1, 2016 to June 1, 2019, e-mails (and attachments) between Dr. Jorelle Alexander and Dr. Claudia Fegan responsive to the following search terms:

- a. "Cermak";
- b. "Jail";
- c. "oral" and "surgery";
- d. "oral" and "surgeon";
- e. "Cermak" and "trans";
- f. "DOJ"
- g. "HSRF analysis";
- h. "action plan" and "Cermak";
- i. "action plan";
- j. "process improvement" and "Cermak";
- k. "process improvement";
- l. "self" and "assessment";
- m. "Monitoring Team";

- n. “quality of care” and “grievance”;
- o. “access to care” and “grievance”;
- p. “manual log”;
- q. “evening” and “clinic” and “Cermak”;
- r. “Saturday” and “clinic” and “Cermak”; or
- s. “emerg” and “oral”

When responding to this request, please also produce the electronic information identifying the number of “hits” in response to each search term.

6. From January 1, 2016 to June 1, 2019, e-mails (and attachments) between Dr. Jorelle Alexander and Dr. Connie Mennella responsive to the following search terms:

- a. “oral” and “surgery”;
- b. “oral” and “surgeon”;
- c. “trans”;
- d. “DOJ”
- e. “HSRF analysis”;
- f. “action plan”;
- g. “process improvement”;
- h. “self” and “assessment”;
- i. “Monitoring Team”;
- j. “quality of care” and “grievance”;
- k. “access to care” and “grievance”;

- l. “manual log”;
- m. “evening” and “clinic”;
- n. “Saturday” and “clinic”; or
- o. “emerg” and “oral”

When responding to this request, please also produce the electronic information identifying the number of “hits” in response to each search term.

7. From January 1, 2016 to August 1, 2018, e-mails (and attachments) between Dr. Alexander and Dr. Esmaeil Porsa. This request includes the electronic information identifying the number of “hits” in response to each search term.

8. If the above identified request is too burdensome, please produce from January 1, 2016 to August 1, 2018 the e-mails (and attachments) between Dr. Alexander and Dr. Porsa responsive to the following search terms:

- a. “oral” and “sur”;
- b. “trans”;
- c. “x-ray”;
- d. “xray”;
- e. “HSRF analysis”;
- f. “action” and “plan”;
- g. “process” and “improvement”;
- h. “digital panoramic”;
- i. “oral surgery” and “referral”;

- j. “emergent” and “oral”;
- k. “saturday” and “clinic”; or
- l. “evening” and “clinic”

This request includes the electronic information identifying the number of “hits” in response to each search term.

9. From January 1, 2016 to June 1, 2019, emails (and attachments) maintained in Denise Little’s e-mail account (dlittle@cookcountyhhs.org) responsive to the following terms:

- a. “HSRF” and “analysis”;
- b. “HSRF” and “log”;
- c. “HSRF”;
- d. “oral” and “surg”;
- e. “DOJ”;
- f. “action plan” and “Cermak”;
- g. “action plan”;
- h. “process improvement” and “Cermak”;
- i. “process improvement”;
- j. “self” and “assessment”;
- k. “Monitoring Team”;
- l. “quality of care” and “grievance”;
- m. “access to care” and “grievance”;
- n. “manual log”;

- o. “Monitoring Team”;
- p. “quality of care” and “grievance”;
- q. “access to care” and “grievance”; or
- r. “manual log”

This request includes the electronic information identifying the number of “hits” in response to each search term.

10. From February 19, 2018 to the present, the records identifying Division 6 detainees prescribed amoxicillin and the “Order Start Date/Time” and “End-state Date/Time” for each prescription. On information and belief, this information is maintained electronically by Cook County.

11. From February 19, 2018 to the present, data identifying the wait time for a Division 6 patient after he submits a health service request form that caused an “urgent” dental appointment.

12. From February 19, 2018 to the present, documents identifying the patients referred to the Stroger oral surgery clinic from Division 6.

13. From February 19, 2018 to the present, data identifying the wait time for a Division 6 patient to be evaluated at the Stroger oral surgery clinic after a dentist enters a referral order for an extraction.

14. From January 1, 2016 to June 1, 2019, all self-assessment reports presented to the DOJ Monitoring Team by Cermak dental services.

15. From January 1, 2016 to the present, all e-mails and attachments found in Sandy Hardesty's e-mail account (shardesty@cookcountyhhs.org) responsive to the following search terms:

- a. "oral" and "xray";
- b. "oral" and "x-ray";
- c. "oral" and "surg";
- d. "dental" and "vacuum";
- e. "dental" and "compress";
- f. "dental" and "xray";or
- g. "dental" and "x-ray"

This request includes the electronic information identifying the number of "hits" in response to each search term.

16. Sandy Hardesty wrote an e-mail on October 26, 2018 to Dr. Alexander and several other County employees writing "For your info - Cermak Dental Equipment and Upgrade to Digital X-Ray. This provides for the replacement of the remainder of dental chairs, vacuums, and compressors and also the x-ray units." See County-Harvey 00844. Produce all documents regarding the County Board's approval of these documents along with a status of efforts to procure equipment outlined in this e-mail.

17. Dr. Alexander executed a declaration on December 7, 2020 in *Carr v. Sheriff*, 17-cv-7135 stating "After I personally assessed whether an oral surgeon was needed at the Jail, I concluded that an oral surgeon at the Jail was

not necessary because Jail detainees receive appropriate and timely care at Stroger OMFS, which is a hospital-based clinic. Exhibit 1, Alexander Decl. Par.

16. Produce all data considered by Dr. Alexander when formulating this conclusion.



An attorney for the plaintiff

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CERTIFICATE OF SERVICE

I, Patrick W. Morrissey, state that I served the foregoing on the undersigned attorney for defendants by Email on February 16, 2021.

Brian Gainer
Monica Burkoth
Lisa M. McElroy
Samuel Branum
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